

Presentment Date: March 15, 2023, at 12:00 noon (Eastern Time)
Objection Deadline: March 10, 2023, at 4:00 p.m. (Eastern Time)

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Proposed Counsel to Official Committee of Unsecured Creditors

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

Re: Docket No. 96

**THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS' RESERVATION
OF RIGHTS WITH RESPECT TO THE STIPULATION AND AGREED ORDER
BY AND AMONG THE DEBTORS AND THE FOREIGN REPRESENTATIVE OF
THREE ARROWS CAPITAL, LTD. REGARDING CERTAIN DISPUTED ASSETS**

The Official Committee of Unsecured Creditors (the “**Committee**”) appointed in the cases of the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”), by

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s tax identification number (as applicable), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these chapter 11 cases, the service address for the Debtors is 250 Park Avenue South, 5th Floor, New York, NY 10003.

and through its undersigned counsel, with respect to the *Stipulation and Agreed Order by and Among the Debtors and the Foreign Representatives of Three Arrows Capital, Ltd. Regarding Certain Disputed Assets* [Docket No. 96] (the “**Stipulation**”),² respectfully states:

Reservation of Rights

1. The Committee does not object to the Stipulation, which it views as essentially nothing more than a placeholder. The Stipulation (i) fixes the date on which any rights Three Arrows may have as to adequate protection shall be calculated and (ii) sets forth the Debtors’ agreement not to transfer certain assets in their possession described therein without providing notice to the Foreign Representatives.

2. As of the date hereof, the Committee is still reviewing and investigating the Debtors’ relationship with Three Arrows, including, among other aspects, the nature and extent of any alleged claim or interest of Three Arrows against the Debtors or their assets. As a result, the Committee reserves all rights, remedies, and arguments, without waiver, in connection with that relationship, the Stipulation, and any future assertion of a claim or interest by Three Arrows against the Debtors or their property.

² Terms used, but not defined, in this Reservation of Rights have the meaning ascribed to such terms in the Stipulation.

Dated: March 10, 2023
New York, New York

Respectfully submitted,

By: /s/ J. Christopher Shore

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